

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

Jane Does 1-9,
Plaintiffs,
vs.
Collins Murphy, et al.,
Defendants.

Case No.: 7:20-cv-00947

SUPPLEMENTAL DECLARATION OF CONSTANTINOS CHRISTOFOROU

Constantinos Christoforou being duly sworn, does hereby depose and state:

1. My name is Constantinos Christoforou. Unless otherwise stated, I make this affidavit of my own personal knowledge.
2. I am a Director of Wisebits, Ltd. ("WL"); Wisebits IP Ltd. ("WIP"); and TrafficStars, Ltd. ("TL").
3. I reside in Cyprus and can confirm that the name "Constantinos Chistoforou" is a common name in Cyprus.
4. I reviewed a list obtained from CyprusRegistry.com which, when searching my name, returned a list of 228 instances where my name, or a name similar to my name, appear in a Cyprus corporate record – according to CyprusRegistry.com (the "List"). I have never had any connection whatsoever to the vast majority of entities contained on that list.
5. The overwhelming majority of entities listed (including those with which I never played any role) appear to be dissolved and not active companies.
6. The vast majority of companies listed have no connection to Hammy Media Ltd.

7. There are some entities on the list that, at one point in time I served as a director, but for which I no longer hold any role.

8. There are also some entities on the list for which I do serve as a director but which are wholly unrelated to HML.

9. All told, the number of companies on the list for which I actually serve as a director and which are related to HML is a small fraction of the full 228 entities listed.

10. Approximately 28% of TL's customers come from the United States.

11. TL provides advertising services to many adult websites that are unrelated to Hammy Media Ltd. or the xhamster.com website.

Signed under the pains and penalties of perjury this 10 day of March, 2023.



Constantinos Christoforou, Director
Wisebits, Ltd., Wisebits IP Ltd., and
TrafficStars, Ltd.